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Attorneys for Plaintiff Steve Karagiosian

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

OMAR RODRIGUEZ; CINDY GUILLEN-
GOMEZ; STEVE KARAGIOSIAN;
ELFEGO RODRIGUEZ; AND JAMAL
CHILDS,

Plaintiffs,

-vs-

BURBANK POLICE DEPARTMENT; CITY
OF BURBANK; AND DOES 1 THROUGH
100, INCLUSIVE.

Defendants.

CASE NO.: BC 414 602

Complaint Filed: May 28, 2009
Assigned to: Hon. Joanne B. O'Donnell, Judge
Dept: 37

**PLAINTIFF STEVE KARAGIOSIAN'S
REQUESTED JURY INSTRUCTIONS AND
SPECIAL VERDICT FORM**

Final Status Conference: 6/8/2011
Trial Date: 6/8/2011

BURBANK POLICE DEPARTMENT; CITY OF
BURBANK,

Cross-Complainants,

-vs-

OMAR RODRIGUEZ, and Individual,

Cross- Defendant.

Plaintiff, Steven Karagiosian, respectfully requests that this Court give the following
numbered Judicial Council of California Civil Jury Instructions (CACI), special
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6/6

instructions and verdict forms and any further or additional instructions that may be subsequently requested:

<u>CACI No.</u>	<u>Given as Proposed</u>	<u>Given as Modified</u>	<u>Refused</u>	<u>Withdrawn</u>
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1 Plaintiff further requests that the following attached special jury instructions and special
2 verdict be given to the jury:

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No.	Description	Given as	Given as	Refused	Withdrawn
		Proposed	Modified		
1	Reasonable Steps to Prevent Harassment				

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8 Plaintiff further requests that the following special verdict form be given to the jury:

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No.	Description	Given as	Given as	Refused	Withdrawn
		Proposed	Modified		
1	Special Verdict/Harassment				

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14 Dated: June 6, 2011

Respectfully submitted,

LAW OFFICES OF RHEUBAN & GRESEN

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17 By: Steven M. Ciske
Steven M. Ciske
Attorneys for Plaintiff, Steve Karagiosian

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1 PLAINTIFF'S PROPOSED JURY INSTRUCTION NO. 1

2 REASONABLE STEPS TO PREVENT HARASSMENT

3 Reasonable steps to prevent harassment, discrimination or retaliation from
4 occurring may include affirmatively raising the subject of harassment, discrimination or
5 retaliation, expressing strong disapproval, developing appropriate sanctions, informing
6 employees of their right to raise and how to raise the issue of harassment, discrimination
7 or retaliation under law, and developing methods to sensitize all concerned.

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9 Authority: *Trujillo v. N. County Transit Dist.* (1998) 63 Cal. App. 4th 280, 287; *Northrop*
10 *Grumman Corp. v. Workers' Comp. Appeals Bd.* (2002) 103 Cal.App.4th 1021;
BAJI 12.20 (2001 Revision).

11 GIVEN AS REQUESTED:

12 GIVEN AS MODIFIED:

13 REFUSED:

14 WITHDRAWN:

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16 JUDGE, SUPERIOR COURT
17 COUNTY OF LOS ANGELES
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1 If your answer to question 7 is yes, then answer question 8. If you answered no, stop
2 here, answer no further questions, and have the presiding juror sign and date this form.

3 8. Was the harassing conduct a substantial factor in causing harm to Steve
4 Karagiosian?

5 _____ Yes _____ No

6 If your answer to Question 8 is "yes," then answer Questions 9 and 10. If you
7 answered "no," stop here, answer no further questions, and have the presiding juror sign and
8 date this form.

9 9. Did the Burbank Police Department take reasonable steps to prevent the harassing
10 conduct?

11 _____ Yes _____ No

12 10. What are Steve Karagiosian' damages?

13 Amount: _____

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16 Dated: _____

17 _____
18 Presiding Juror

19 After all verdict forms have been signed, deliver this verdict form to the
20 [clerk/bailiff/judge].
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